

 ORIGINAL

FILED
DISTRICT COURT OF GUAM

JAN 08 2008

**JEANNE G. QUINATA
Clerk of Court**

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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF GUAM

11 UNITED STATES OF AMERICA, } CRIMINAL CASE NO. 07-00073
12 Plaintiff, }
13 vs. }
14 JUNE GONZAL QUINDO, JR., }
15 Defendant. }

**GOVERNMENT'S MOTION TO
FILE JUSTIFICATION UNDER SEAL**

17 COMES NOW the United States of America, by and through undersigned counsel, and
18 moves this Honorable Court for an Order allowing it to file its justification under seal. The
19 government makes this motion because the justification explains in detail the reasons
20 that it is seeking a substantial assistance downward departure for defendant. It believes the
21 nature of the information has the potential of resulting in retaliation to the defendant.

22 | RESPECTFULLY SUBMITTED this 8th day of January, 2007.

LEONARDO M. RAPADAS
United States Attorney
Districts of Guam and NMI

By: 
ROSETTA L. SAN NICOLAS
Assistant U.S. Attorney